

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

JOSEPH LAFRANCE
Appellant

v.

PHOEBE MORSE,
UNITES STATES TRUSTEE,
DENISE PAPPALARDO,
STANDING
CHAPTER 13 TRUSTEE
Appellees

Consolidated Appeals
Case No. 05-CV-3002 I-MAP

FILED
CLERK'S OFFICE
2005 MAY -4 A 11:17
U.S. DISTRICT COURT
DISTRICT OF MASS

MOTION TO
EXTEND DEADLINE FOR FILING APPELLANT'S REPLY BRIEF

The undersigned counsel moves the Court to extend the deadline for filing a reply brief in this appeal for twenty (28) days, until Wednesday, June 1, 2005 or such other time as this Court may deem appropriate. As grounds therefor, the Movant says that he requires additional time to respond to issues raised in the brief filed by Stephen E. Meunier, Esq. on April 29, 2005.


No party in interest will be harmed by the requested extension, and in his last motion to extend Mr. Meunier as part of his assent stated that he "would assent to a corresponding extension of time for the Appellant to file a reply brief".

On 03/02/2005 [6] a Motion for Extension of Time for 30 days to File Brief was filed by Denise M. Pappalardo. On 03/09/2005 [7] a Motion for Extension of Time to April 8, 2005 to File Brief by Attorney Meunier. On 04/18/2005 [10] a second Motion for Extension of Time to April 29, 2005 to File Appellee Brief was filed by Mr. Meunier which was allowed by the Court. On April 29, 2005 Mr. Meunier filed the brief of the U.S. Trustee. In his brief Mr. Meunier argues that the medical condition of the Movant

herein, advanced diabetes and polyneuropathy are not significant enough to cause the Movant to be unable to meet the 60 day deadline imposed by the bankruptcy judge. Movant requires time to meet with the three health care providers to obtain sufficient medical documentation which, Movant believes will establish that the medical conditions of diabetes and polyneuropathy did interfere with Movant's ability to meet the 60 day deadline imposed by the bankruptcy judge .

WHEREFORE, the Movant prays that the Court enter an order extending the deadline for filing his reply brief for twenty (28) days to June 1, 2005. or such other time as this Court deems appropriate.

Respectfully submitted,


Francis J. Lafayette. Esq.
1024 Park Street
PO Box 1020
Palmer, MA 01069
(413) 283-7785
BBO# 282960

Dated: May 4, 2005

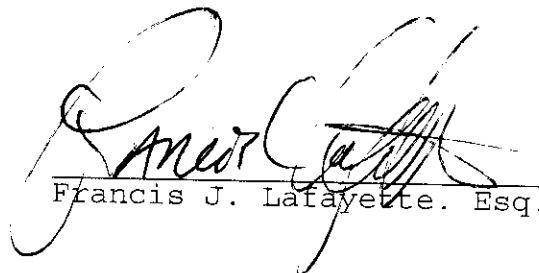
CERTIFICATE OF SERVICE

I hereby certify that on May 4, 2005, a true and correct copy of the foregoing MOTION TO EXTEND DEADLINE FOR FILING APPELLANT'S REPLY BRIEF was served in-hand and/or by first class mail, postage pre-paid and/or via ECF upon:

Stephen E. Meunier, Esq. BBO# 546928
Trial Attorney
U.S. Department of Justice
Office of the U.S. Trustee
446 Main Street, 14th Floor
Worcester, MA 01608

Denise M. Pappalardo, Esq.
Chapter 13 Trustee
PO Box 16607
Worcester, MA 01601

Dated: May 4, 2005



Francis J. Lafayette. Esq.

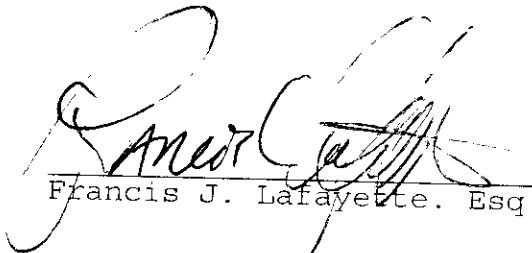
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Stephen E. Meunier, Esq. BBO# 546928
Trial Attorney
U.S. Department of Justice
Office of the U.S. Trustee
446 Main Street, 14th Floor
Worcester, MA 01608

Denise M. Pappalardo, Esq.
Chapter 13 Trustee
PO Box 16607
Worcester, MA 01601

Dated: May 4, 2005


Francis J. Lafayette, Esq.

This motion is assented to by
the U.S. Trustee's office (Stephen E. Meunier
and the Ch 13 Trustee (By John Silois)
Signed under the pains & penalties of perjury
on May 4, 2005

